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Attorneys for Defendants Laborers' International Union of
North America, Local 872, Thomas White, Marco
Hernandez, and Chesly Torres

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

PARNELL COLVIN, RICHARD VELLA,

Plaintiffs,

v.

TOMMY WHITE AKA THOMAS WHITE,
INTERNATIONAL UNION OF NORTH
AMERICA LOCAL 872 LABORERS,

Defendants.

No. 2:21-cv-02109-RFB-NJK

**DECLARATION OF SEAN W.
MCDONALD IN SUPPORT OF
DEFENDANTS' REPLY TO RESPONSE
TO MOTION TO DISMISS AMENDED
COMPLAINT**

[ECF No. 36]

I, Sean W. McDonald, declare as follows:

1. I am over the age of 18 and competent to testify. I am an attorney admitted to the bars of the State of Nevada and of this Court. I have personal knowledge of the facts stated herein and I could and would testify to the same if called upon to do so.

2. I am counsel of record for Defendants, Laborers' International Union of North America, Local 872 ("Union" or "Local 872"),¹ its Business Manager / Secretary Treasurer, Thomas White, Marco Hernandez, and Chelsy Torres. I make this declaration in support of the Defendants' Reply to Response to Motion to Dismiss Amended Complaint.

¹ Plaintiffs incorrectly named the Union as "International Union of North America Local 872 Laborers."

3. On Saturday, October 1, 2022, Plaintiff Colvin wrote an email to Judge Boulware's courtroom administrator, copying counsel, claiming that the courthouse was inaccessible on Friday, September 30, 2022, due to some sort of emergency, which prevented persons from entering the courthouse, and which prevented Mr. Colvin from timely filing Plaintiffs' response. A true and correct copy of the email is attached to this declaration as **Exhibit 1**.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 10th day of October, 2022, at Las Vegas, Nevada.

/s/ Sean W. McDonald
Sean W. McDonald

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CERTIFICATE OF SERVICE

I hereby certify that on October 10, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

[none]

And I hereby certify that I have mailed by the United States Postal Service, postage prepaid, the document to the following non-CM/ECF participants:

Parnell Colvin
6681 Tara Ave
Las Vegas, NV 89120

Richard Vela
867 N Lamb Blvd Space 82
Las Vegas, NV 89110

And I hereby certify that I have emailed the document to the following non-CM/ECF participants per consent to serve by electronic means noted below:

Parnell Colvin – pc681@yahoo.com
(*Per Consent for Electronic Service of Documents, ECF No. 31*)

Dated: October 10, 2022

/s/ Sean W. McDonald
An Employee of Weinberg, Roger & Rosenfeld